



Metropolitan
Milwaukee
Association of
Commerce

Council of Small Business Executives

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February 13, 2003

ORIGINAL

Honorable Michael Powell
Chairman
Federal Communications Commission 445 12th Street, SW
Washington, DC 20544

RE: CC Docket No. 01-338, Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers

Dear Chairman Powell:

I am aware that you are in deliberations on the effectiveness of 1996 Telecom Act. I am hopeful that through your deliberations, the Federal Communications Commission will eliminate the current unbundling regime (UNE-P), whose harmful effects only serve as a weight pulling down the telecommunications industry. This platform, as considered in the past, has not provided incentive for telecom growth. The current regime of UNE-P has adversely affected capital investment and jobs in the telecom sector and in the overall economy.

The Metropolitan Milwaukee Association of Commerce has over 2,200 professional business members and encourages business development, capital investment and job creation. We are committed to promoting business reforms to ensure a qualified workforce, and we advocate for policies that create a pro-business environment and promote incentive, for businesses to succeed with employment opportunities. The current Unbundling Network Element platform does not help to promote a business growth environment.

I am hopeful that the FCC will abandon the current unbundling regime in favor of a new paradigm that encourages sustainable competition and facilitates investment. The telecom industry has lost over one trillion dollars and 500,000 jobs over a three-year period under the current unbundling requirements.

Capital spending by telecom companies has come to a halt. As you know, capital spending leads to jobs and economic growth within communities. In order to stem this downward trend, a new policy that favors infrastructure investment by all telecom companies is needed.

1/16/03
Liaison
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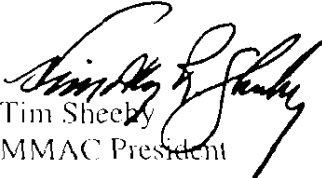
Lastly, freeing **up** broadband investment from costly unbundling requirements is also a matter that should be considered. The FCC should not impose an unbundling scheme on the deployment of broadband facilities. That would have a similar negative impact on the growth of new technologies in the State of Wisconsin and nationwide.

We need to assist the efficiency and capabilities of small and large businesses in our state. We also need to look at the growth opportunities that broadband deployment offers to rural and growing communities. Placing an unbundling requirement on broadband facilities will not enhance growth in any of these areas.

I am hopeful that my concerns will be given due consideration as you look to make a favorable impact on our economy.

Thank you for your time and consideration of my recommendations.

Sincerely,


Tim Sheehy
MMAC President

CC:

Commissioner Abernathy
Commissioner Adelstein
Commissioner Martin
Commissioner Copps ✓